

discussion Applicants presented amendments and arguments substantially as indicated in this amendment. Agreement was reached that the present amendment overcomes the outstanding rejection.

In response to the objection to the drawings, Applicants wish to thank the Examiner for indicating that formal correction of the noted defect can be deferred until the application is allowed by the Examiner. Applicants submit that upon receiving a formal Notice of Allowance, Applicants will file formal drawings which correct the noted defect and the objection will be overcome.

Turning now to the merits, Applicants' invention is directed to a method and system for distributing promotional information. The inventors of the present application have identified a need for a system which can provide targeted promotional information in the way of advertising, coupons, etc. to consumers at a time when work or personal obligations do not otherwise command the consumers' attention. The claimed invention meets this need by providing a method and system for automatically distributing promotional information to occupants of a vehicle based on a geographic position of the vehicle.

Specifically, Applicants' Claims 1 and 29, as amended, recite an in-vehicle promotion system that includes a receiver, a controller connected to the receiver, an interior display connected to the controller and configured to be installed in an interior of the vehicle, and that the display displays promotional information based on a position of the vehicle. Similarly, Claims 43 and 60 recite a method of displaying promotions information to a vehicle occupant including displaying on an interior display promotion based on the vehicle position. Thus, each of Applicants' independent Claims 1, 29, 43, and 60 recite an interior display that displays promotions information based on vehicle position data.

In contrast, Cohen discloses a public advertising system wherein a monitor mounted on the exterior of a mobile vehicle generates a publicly viewable message to pedestrians who see the vehicle. The public advertising system includes a controller that determines the location of the mobile vehicle and displays advertising messages on the exterior display based on the location determined. Thus, Cohen does not teach or suggest an interior display configured to be mounted to an interior of the vehicle as now clarified in Applicants' amended Claims 1, 29, 43, and 60.

The reference to Brohoff discloses a geographical database connected to a mobile radio network that contains information about consumer services within the network. A user accesses the database and requests information about the location of establishments. Malackowski et al discloses a system and method for providing information to a car having a wireless communications device. The system allows a caller to obtain advertising information after wireless contact is established from the communications device of the user. Thus, neither Brohoff nor Malackowski et al disclose a system for receiving advertising information in a mobile vehicle based on the position of the mobile vehicle. While each of these references discloses an interior display, Applicants respectfully submit that none of the cited references suggest or provide motivation to combine an interior display with the location based system of Cohen. Indeed, as Cohen is directed to a mobile advertising system which targets an audience of a particular geographic zone by displaying a message to pedestrians within that zone when the vehicle drives through the zone, Cohen essentially teaches away from interior display which displays an advertisement only to occupants of the

vehicle.¹ Thus, Claims, 1, 29, 43, and 60 as amended, patentably define over the cited references.

In addition to an interior display, Applicants note that Claims 2, 16, 30, 31, 46, and 62 to recite a printer connected to the controller, or method step of printing promotional information determined based on the vehicle position. As acknowledged in the Official Action, Cohen does not disclose a printer.² However, the Official Action cites Malackowski as disclosing a printer and concludes that it would have been obvious to one of ordinary skill in the art to combine the Malackowski printer with the disclosure of Cohen to arrive at Applicant's claimed invention. Applicants respectfully submit, however, that there is simply no motivation to modify the system of Cohen to include a printer.

As discussed above, the system of Cohen is intended to generate a publicly viewable message on the exterior of a moving vehicle based on the location of the moving vehicle so that the public viewing the message will be in close proximity of the establishment for which the advertising message is generated. Applicants submit that providing a printer for such a system is contrary to the intended purpose of the system which is to communicate a message to large targeted group of pedestrians viewing the vehicle. Moreover, neither Cohen nor Malackowski disclose motivation for combining a printer with a mobile advertising system. Thus, the printer of Claims 2, 16, 30, 31, 46, and 62 provides an additional distinction over the cited references.

¹Cohen et al. at col. 1, lines 22-38.


²Official Action, page 9, Item 7, line 4.

As independent Claims 1, 29, 43, and 60 patentably define over the cited references as detailed above, dependent claims 3-8 and 10-20, 30-42, 44-57, and 61-64 which depend therefrom respectively also patentably define over the cited references.

Consequently, in view of the present amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Robert C. Mattson
Registration No. 42,850
Attorney of Record
Edwin D. Garlepp
Registration No. 45,330



22850

Tel. No. (703) 413-3000
Fax #: (703) 413-2220
RCM\EDG:law
I:\atty\edg\7791\77910085-am.wpd